

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in compliance with D.N.J. LBR 9004-1(b)	
HILL WALLACK LLP Mark A. Roney, Esq. 21 Roszel Road P.O. Box 5226 Princeton, NJ 08543 Phone: 609-924-0808 Email: mroney@hillwallack.com <i>Attorneys for U.S. Asset Funding, LP</i>	
In Re: Karine G. Peterside aka Karine Peterside, Debtor.	Case No.: 23-13870 (CMG) Chapter: 13 Judge: Christine M. Gravelle, U.S.B.J. Proposed Hearing Date: May 17, 2023 at 9:00 a.m.

**NOTICE OF MOTION FOR AN ORDER GRANTING RELIEF
FROM THE AUTOMATIC STAY AND CO-DEBTOR STAY**

<p>To: Jeanne A. Naughton, Clerk 402 East State Street Trenton, NJ 08608</p> <p>Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650 Trustee</p> <p>John M. McDonnell, Esq. McDonnell Crowley, LLC 115 Maple Avenue Red Bank, NJ 07701 Debtor's Attorney</p>	<p>Karine G. Peterside aka Karine Peterside 14 Mountain Court Millstone, NJ 08510 Debtor</p> <p>Chamberlain Peterside 14 Mountain Court Millstone, NJ 08510 Co-Debtor</p> <p>Internal Revenue Service P.O. Box 7346 Philadelphia, PA 19101-7346 Secured Creditor</p> <p>Xcellon Capital Advisors Limited c/o Chamberlain S. Peterside, CEO 14 Mountainview Court Millstone, New Jersey 08510 Secured Creditor</p>
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PLEASE TAKE NOTICE, that on May 17, 2023 at 9:00 a.m., or as soon thereafter as counsel may be heard, Hill Wallack LLP, attorneys for secured creditor, U.S. Asset Funding, LP (“Cross-Movant”), shall cross-move before the Honorable Christine M. Gravelle, U.S.B.J. at the United States Bankruptcy Court, 402 East State Street, Courtroom #3, Trenton, New Jersey 08608 for an Order granting Cross-Movant relief from the automatic stay with respect to the debtor, Karine G. Peterside aka Karine Peterside (“Debtor”) pursuant to Section 362(d)(1) of the Bankruptcy Code and relief from co-debtor stay with respect to co-debtor, Chamberlain Peterside, pursuant to Section 1301(c) with respect to real property located at 14 Mountain Court, Millstone, NJ 08510; and

PLEASE TAKE FURTHER NOTICE, that Cross-Movant shall rely upon the accompanying Certification of Counsel in support of its Motion; and

PLEASE TAKE FURTHER NOTICE, that in accordance with LBR 9013-1(a) and LBR 9013-4, a proposed form of Order is submitted herewith.

HILL WALLACK LLP
Attorneys for Cross-Movant

By: /s/ Mark A. Roney
Mark A. Roney

Dated: May 10, 2023